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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

RYAN BUTTON, ON BEHALF OF
HIMSELF AND THOSE SIMILARLY
SITUATED,

Plaintiff,

vs.

DOLLAR GENERAL CORPORATION,
DOLGENCORP, LLC D/B/A DOLLAR
GENERAL, TODD VASOS, JEFF OWEN,
STEVE SUNDERLAND, EMILY
TAYLOR, AND JOHN DOES 1-500,
INDIVIDUALLY, JOINTLY,
SEVERALLY, OR IN THE
ALTERNATIVE,

Defendants.

CIVIL ACTION NO.:
3:22-cv-07028-MAS-RAS

Removed from Superior Court of
New Jersey, Monmouth County,
Law Division

Docket No. MON-L-002774-22

**NOTICE OF MOTION FOR
REMAND**

Motion Date: February 21, 2023

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Javier L. Merino and the exhibits annexed thereto, and upon all prior pleadings and proceedings in this action, Plaintiff, Ryan Button, on behalf

of himself and all others similarly situated (“Plaintiff”), will move before this Court on February 21, 2023, pursuant to 28 U.S.C. §1447(c), for remand of this matter to the Law Division of the Superior Court of New Jersey-Monmouth County.

PLEASE TAKE FURTHER NOTICE that oral argument is requested if this Motion is opposed, pursuant to Local Civil Rule 78.1(b); and

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is attached hereto.

Respectfully submitted,

THE DANN LAW FIRM, PC

/s/ Javier L. Merino

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Dated: January 16, 2023